

1 HEATHER L. RICHARDSON, SBN 246517
hrichardson@gibsondunn.com

2 LAUREN M. BLAS, SBN 296823
lblas@gibsondunn.com

3 NICOLE R. MATTHEWS, SBN 328977
nmatthews@gibsondunn.com

4 **GIBSON, DUNN & CRUTCHER LLP**

333 South Grand Avenue
5 Los Angeles, CA 90071-3197
Telephone: 213.229.7000
6 Facsimile: 213.229.7520

7 GEOFFREY SIGLER (*pro hac vice*)

gsigler@gibsondunn.com

8 MATTHEW GUICE AIKEN (*pro hac vice*)

maiken@gibsondunn.com

9 **GIBSON, DUNN & CRUTCHER LLP**

1050 Connecticut Avenue, N.W.
10 Washington, D.C. 20036-5306
Telephone: 202.887.3752
11 Facsimile: 202.530.9635

12 Attorneys for Defendants UNITED BEHAVIORAL HEALTH and UNITED HEALTHCARE
INSURANCE COMPANY

13 MOE KESHAVARZI, SBN 223759

mkeshavarzi@sheppardmullin.com

14 DAVID DWORSKY, SBN 272167

ddworsky@sheppardmullin.com

15 **SHEPPARD, MULLIN, RICHTER & HAMPTON LLP**

333 South Hope Street, 43rd Floor
16 Los Angeles, California 90071
Telephone: 213.620.1780
17 Facsimile: 213.620.1398

18 ERROL J. KING, JR. (*admitted pro hac vice*)

Errol.King@phelps.com

19 CRAIG L. CAESAR (*admitted pro hac vice*)

Craig.Caesar@phelps.com

20 KATHERINE CICARDO MANNINO (*admitted pro hac vice*)

Katie.Mannino@phelps.com

21 TAYLOR J. CROUSILLAC (*admitted pro hac vice*)

Taylor.Crousillac@phelps.com

22 **PHELPS DUNBAR LLP**

II City Plaza
23 400 Convention Street, Suite 1100
Baton Rouge, Louisiana 70802
Telephone: 225.376.0207
24 Facsimile: 225.381.9197

25 Attorneys for Defendant MultiPlan, Inc.

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

LD, DB, BW, RH, and CJ on behalf of
themselves and all others similarly situated,

Plaintiffs,

vs.

UNITED BEHAVIORAL HEALTH, INC., a
California Corporation,
UNITEDHEALTHCARE INSURANCE
COMPANY, a Connecticut Corporation, and
MULTIPLAN, INC., a New York
Corporation,

Defendants.

Case No. 4:20-cv-02254-YGR-JCS

(Hon. Yvonne Gonzalez Rogers)

**DECLARATION OF ERROL J. KING,
JR. IN SUPPORT OF DEFENDANTS'
NOTICE OF MOTION AND MOTION
TO EXCLUDE THE EXPERT OPINION
AND DECLARATION OF PROFESSOR
ALEXANDRA D. LAHAV**

I, ERROL J. KING, JR., an attorney, declare under penalty of perjury, that the following is true and correct, based on my personal knowledge:

1. I am an attorney at law duly licensed to practice before all courts in the State of Louisiana and admitted *pro hac vice* in this matter. I am a partner at Phelps Dunbar LLP and counsel of record for Defendant, MultiPlan, Inc., in the instant action.

2. Attached hereto is a true and correct copy of excerpts of Professor Alexandra D. Lahav's Deposition taken on September 23, 2022.

Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury and the laws of the United States and the State of California that the foregoing statements are true and correct, and that this Declaration was executed on the 12th day of October, 2022, in Baton Rouge, Louisiana.

Errol J. King, Jr.

Errol J. King, Jr.